

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to: 19-cv-10713 (LAK)

MASTER DOCKET  
18-md-2865 (LAK)

STIPULATION AND [PROPOSED] ORDER  
REGARDING TIME TO ANSWER

Plaintiff Skatteforvaltningen (“SKAT”) and Defendants 2321 Capital Pension Plan, Bowline Management Pension Plan, California Catalog Company Pension Plan, Clove Pension Plan, Davin Investments Pension Plan, Delvian LLC Pension Plan, DFL Investments Pension Plan, Laegeler Asset Management Pension Plan, Lion Advisory Inc. Pension Plan, Mill River Capital Management Pension Plan, Next Level Pension Plan, Rajan Investments LLC Pension Plan, Spirit on the Water Pension Plan, and Traden Investments Pension Plan (together, the “**Plan Defendants**”) by and through their undersigned attorneys, hereby stipulate and agree as follows:

**WHEREAS**, on November 19, 2019, SKAT brought suit in this Court against the Plan Defendants. (Dkt. 1.)

**WHEREAS**, the Plan Defendants’ time to answer or otherwise move against the Complaint is April 20, 2020. (See Dkt. 45. Exhibits A, B, C & D.)

**WHEREAS**, on March 27, 2020, SKAT moved for leave to amend its Complaints in this multidistrict litigation and moved to make its Amended Complaints due 14 days after this Court granted the Motion for Leave to Amend. (Dkts. 50, 51.)

**WHEREAS**, on April 13, 2020, the Court granted SKAT's Motion for Leave to Amend (Dkt. 54), thus setting the deadline for SKAT to file its amended complaints on April 27, 2020.

**WHEREAS**, SKAT intends to file an Amended Complaint in this action on or before April 27, 2020.

**NOW THEREFORE**, the parties hereby stipulate and agree that the Plan Defendants need not answer or otherwise respond to SKAT's original Complaint and instead will answer or otherwise respond to the Amended Complaint.

Dated: New York, New York  
April 16, 2020

AKIN, GUMP, STRAUSS, HAUER & FELD LLP

By: /s/ Robert H. Pees  
(e-signed with consent)  
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*Authorized only to sign this stipulation on behalf of Defendants California Catalog Company Pension Plan, Davin Investments Pension Plan, DFL Investments Pension Plan, Laegeler Asset Management Pension Plan, Next Level Pension Plan, Rajan Investments LLC Pension Plan, and Spirit on the Water Pension Plan*

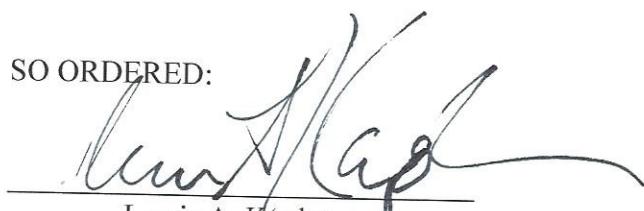
MORVILLO ABRAMOWITZ GRAND IASON & ANELLO PC

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*Counsel for Defendants Clove Pension Plan, Delivan LLC Pension Plan, Mill River Capital Management Pension Plan, and Traden Investments Pension Plan*

SO ORDERED:

  
Lewis A. Kaplan  
United States District Judge

4/17/2020